

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO as representative of THE COMMONWEALTH OF PUERTO RICO Debtor	PROMESA TITLE III Case No. 17 BK 3283-LTS
In Re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO as representative of PUERTO RICO ELECTRIC POWER AUTHORITY Debtor	TITLE III No. 17 BK 4780-LTS Court Filing Relates Only to PREPA and Shall only be Filed Case No. 17- BK-4780 (LTS) and Main Case 17- BK-3283 (LTS)

MOTION TO WITHDRAW EXHIBIDS II, III, VI AND V FROM DOCKET 3019

TO THE HONORABLE COURT:

COMES NOW Autonomous Municipality of Ponce (hereafter, “AMP”), through the undersigned counsel and very respectfully states and prays:

1. Movant AMP has filed today a “Motion for Relief of Stay”, together with an Exhibit, which is in the Spanish language, see Docket 3019.
2. The undersigned submit those documents in order to sustain the factual allegations of the Motion in order to sustain the “cause” for the lift of stay submitted.
3. On docket 3023, this Honorable Court set briefing schedule in connection with AMP Lift of Stay, among other things, granted and extension until June 6, 2018 to file a

translation.

4. Do to the extensive in nature of those documents, the coordination for the translation require much time and resources and will delay the adjudication of the stay in the “Ponce en Marcha” case, the AMP request this Court to allow to withdraw the exhibits II thru V.

5. The AMP understand that to proper evaluate the “cause” of the lift of stay, those documents just give a historical reference to the present status of the “Ponce en Marcha” case and will not be necessary for the merits of the request in docket 3019.

WHEREFORE, Movant AMP very respectfully requests this Honorable Court to GRANTED the present request and allow the AMP to withdraw the Exhibits II thru V of the docket 3019 and continue with the briefing schedule of the ORDEN in docket 3023 with any further remedy that could be deem by law.

Attorney Verification under penalty of perjury:

I, Carlos Fernandez-Nadal, do hereby state as follows:

1. I have been a practicing attorney since 1994, admitted to practice in Puerto Rico that year.

2. I review the Superior Court judgements and the Supreme Court Judgment on “Ponce en Marcha” case, the Transactional Agreement and the documents that Debtors and other partier file before the Superior Court regarding the status of their projects.

3. I am completely bilingual.

4. All references to the text of Spanish-language documents in the docket 3019 motion for lift of stay are based on my own translations.

3. I drafted the pleadings, motions and briefs in the aforementioned cases in the Spanish

5. I make this statement under penalty of perjury and declare it to be true pursuant to the provisions of 28 USC §1746.

In Ponce, Puerto Rico this 6 day of June, 2018

/s/Carlos Fernández-Nadal

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this date, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically notify of such filing to all counsels of record.

In Ponce, Puerto Rico, this 6th day of June, 2018.

/s/Carlos Fernández-Nadal
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